

To: Rodriguez, Dante[Rodriguez.Dante@epa.gov]
Cc: Seter, David[Seter.David@epa.gov]; Jeryl Gardner[JGARDNER@ndep.nv.gov]; John Batchelder (jbatchelder@envirosolve.com)[jbatchelder@envirosolve.com]; Zimmerman, Chuck[CZimmerman@brwnald.com]
From: Oman, Jack
Sent: Wed 6/3/2015 8:51:02 PM
Subject: Yerington FMS activities
Fill Test Plan for Evaporation Ponds B and C.PDF
Phase I Pond Management Plan.pdf

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Dante,

Attached to this email are possible activities to 1) address the solids accumulation issue with the Phase I pond and 2) evaluate for potential leaks with the FMS B and C ponds. The attached "Phase I Pond Management Plan" suggests an approach to create a sump to allow continued fluid pumping from this existing pond. Without this, or similar, modification to the Phase I pond an additional pond or storage structure would need to be constructed to manage this fluid. Additionally, the attached "Hydraulic Testing Plan for Arimetco FMS Evaporation Ponds B and C" suggests an approach to fill test the two ponds to check for leaks that may exist. This Plan was prepared in response to the apparent leak observed in February 2015.

These activities are being proposed as part of the ongoing FMS maintenance work. If the proposed Phase I Management Plan is not sufficient to adequately control fluid levels in the Phase I Pond, or if the proposed Hydraulic Testing Plan detects significant leaks in the Ponds B and C, thus indicating that these components have either reached the expiration of their expected useful life or need major repairs (exceeding \$25,000), Atlantic Richfield expects that EPA will address the conditions appropriately and in accordance with Section 33.c of the 2009 AOC (Docket No. 09-2009-0010).

The activities described in the attached documents are presented for your consideration, at EPA's request. ARC will wait for your direction on how, or if, EPA would like us to proceed.

Please let me know if you would like to discuss further.

Thanks,

-jack

Jack Oman

Project Manager

Atlantic Richfield Company

4 Centerpointe Drive

La Palma, CA 90623-1066

(657) 529-4581 office

(714) 670-5195 fax

(714) 330-1706 mobile

jack.oman@bp.com